

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
OUSSAMA EL OMARI,

Plaintiff,

– against –

RAS AL KHAIMAH FREE TRADE ZONE
AUTHORITY, A/K/A R.A.K. FREE TRADE
ZONE AUTHORITY, A/K/A RAKFTZA, KREAB
(USA) INC., SHEIKH SAUD BIN SAQR AL
QASIMI, and THE ARKIN GROUP LLC

Defendants.
----- X

No. 1:16-CV-3895 (NRB)

(ECF Case)

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION BY DEFENDANTS RAS AL KHAIMAH FREE TRADE ZONE
AUTHORITY AND SHEIKH SAUD BIN SAQR AL QASIMI TO DISMISS
COUNTS I, III AND IV OF THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that pursuant to Rule 12(b)(1), 12(b)(2), 12(b)(3) and 12(b)(6) of the Federal Rules of Civil Procedure, and upon the accompanying declarations of Moulham Al Chawa, Essam Al Tamimi, Stanley Arkin and Linda C. Goldstein and all attached exhibits, Defendants Ras Al Khaimah Free Trade Zone Authority (“RAKFTZA”) and Sheikh Saud bin Saqr Al Qasimi (“Sheikh Saud”), will move this Court for an Order dismissing Counts I, III and IV of the Second Amended Complaint for (i) lack of subject matter jurisdiction, improper venue, and failure to state a claim with respect to RAKFTZA, and (ii) lack of subject matter and personal jurisdiction and failure to state claim with respect to Sheikh Saud, and awarding to Defendants RAKFTZA and Sheikh Saud any other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the parties' agreed-upon briefing schedule, answering affidavits and any other papers in opposition to the above motion are required to be served upon the undersigned on December 2, 2016, and reply papers will be served on December 20, 2016.

DATED: New York, New York
October 28, 2016

Respectfully submitted,

DECHERT LLP

By: /s/ Linda C. Goldstein
Linda C. Goldstein

1095 Avenue of the Americas
New York, New York 10036
Tel: (212) 698-3817
linda.goldstein@dechert.com

*Attorneys for Defendants Ras Al Khaimah Free Trade
Zone Authority, and Sheikh Saud bin Saqr Al Qasimi*

To: MOORE INTERNATIONAL LAW PLLC
Scott Michael Moore
Rockefeller Center
45 Rockefeller Plaza, 20th Floor
New York, New York 10111
(212) 332-3474
smm@milopc.com

Attorneys for Plaintiff Oussama El Omari

DAVIS & GILBERT LLP
James Levine
1740 Broadway
New York, NY 10019
(212) 468-4985
jlevine@dglaw.com

Attorneys for Defendant Kreab (USA), Inc.

GORDON & REES LLP
Mercedes Colwin
One Battery Park Plaza
28th Floor
New York, NY 10004
(212) 453-0702
mcolwin@gordonrees.com

Attorneys for Defendant The Arkin Group LLC